

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MARGARET MAZUR,

Plaintiff,

vs.

SOUTHWESTERN VETERANS CENTER and
DEPARTMENT OF MILITARY AND VETERANS
AFFAIRS,

Defendants.

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} No. 2:17-cv-00826-JFC
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} Judge Conti
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} *Electronically Filed.*
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**RESPONSE TO MOTION FOR
LEAVE TO FILE AN AMENDED COMPLAINT (Doc. # 24)**

AND NOW, come the defendants, Southwestern Veterans Center and Department of Military and Veterans Affairs (“the Defendants”), by their attorneys, Scott A. Bradley, Senior Deputy Attorney General, and Kenneth L. Joel, Chief Deputy Attorney General, Chief, Litigation Section, and respond to the Motion for Leave to File an Amended Complaint (Doc. # 24) previously filed by Plaintiff in this matter:

1. Plaintiff initiated this *pro se* employment rights action by filing a complaint with this Court on June 22, 2017. See Complaint (Doc. # 1).
2. The Defendants answered the Complaint on August 11, 2017, and the parties have since been engaged in discovery.
3. On or about November 30, 2017, Plaintiff filed a motion (Doc. # 24) seeking leave to file an amended complaint to add a retaliation claim which was the subject of a subsequent EEOC charge filed by Plaintiff.
4. This second EEOC charge also arises from Plaintiff’s employment with the Defendants.

5. However, while the documents attached to the Motion (Doc. # 24) and the Brief in Support (Doc. # 25) show that Plaintiff filed this subsequent EEOC Charge of Discrimination and requested a Right to Sue Letter, there does not appear to be a copy of a Right to Sue Letter included in the attachments.

6. Nevertheless, assuming that Plaintiff has received a Right to Sue Letter with regard to this subsequent EEOC Charge of Discrimination, the Defendants do not have an objection to Plaintiff filing an amended complaint.

WHEREFORE, the Defendants respectfully request that the Court enter an appropriate order on Plaintiff's Motion for Leave to File an Amended Complaint (Doc. # 24).

Respectfully submitted,

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Date: January 10, 2018

s/ Scott A. Bradley
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